



# Privacy Policy

January 1, 2024

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Anchor Capital Advisors, LLC, (The Company, Anchor), has policies and procedures in place to safeguard the personal information of its current and former clients and their families, businesses, or other entities. The Privacy policies were adopted to comply with SEC Federal Regulations S-P and S-AM and the Commonwealth of MA regulation 201 CMR 17:00 and the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020(CCPA). Below we explain how The Company collects, uses, retains, discloses and secures personal information.

This Privacy Policy sets forth Anchor's policy with respect to information, including personal sensitive information and other information that is collected from clients in the course of doing business and from clients and/or visitors to our website, <https://www.AnchorCapital.com> . In contracting Anchor's services or using the Company's website you accept the practices and terms set forth in our privacy policy as it may be updated from time to time at the Company's discretion.

## WHAT INFORMATION WE COLLECT

When you interact with us through the contracting our services or using our website, we may collect and process NPPI and other information from you, as further described below:

**Information You Provide to Us.** Personal information, including NPPI that we collect is voluntarily provided by you. This information is required to transact business, communicate with you, verify your identity and fulfill legal and regulatory requirements. The types of information we collect and share may vary depending on the product or service we provide to you. This information may be collected when you:

- Contract for advisory services as defined in our Investment Management Agreement (for example, contact information such as your name, email address, phone number, mailing address, date of birth, or social security number);
- Complete certain forms;
- Upload or submit material either in hard copy or electronically, including uploading to a portal;
- Request any information or contact us with inquiries; or

By voluntarily providing us with personal information, you are giving Anchor Capital Advisors, LLC, permission to use and store it in accordance with this Privacy Policy.

**Information Obtained Through Use of Anchor's Website.** As is the case with most websites, when you visit the site we receive, automatically track and store certain non-identifying information about you, including but not limited to:

- Browser type;
- IP address;
- Language preference;
- Cookies; domain servers;
- URL traffic to, through and from the site;
- Types of computers and operating systems accessing the site;
- Statistical information about behavior of visitors/users to the site; and
- Any other web site usage information that we may collect when you visit the site.



This information, which may be collected passively using various technologies or through other means, cannot be used to specifically identify you. Anchor Capital Advisors, LLC may store such information itself or such information may be included in databases owned and maintained by The Company or vendors. Such information may be pooled with other information for administrative purposes, to assess the usage and to track, how visitors use the site.

For California Residents: Within the past twelve (12) months we have collected the following categories of personal information (as defined under California law) :

- Identifiers, such as your name or email address.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as your name, address, or social security number.
- Internet or other similar network activity.
- Sensitive Personal Information, including personal information revealing an individual's social security number.

We do not use or disclose sensitive personal information for purposes other than those permitted by law and described below. We do not sell or share personal information or sensitive personal information as “sell” and “share” are defined in the CCPA. We may disclose some of the above categories of information to third parties for business purposes. Additional information on such disclosures is provided in a separate section of this notice titled “ Third Party Services.”

## **HOW WE USE YOUR PERSONAL INFORMATION**

Anchor Capital Advisors, LLC considers the protection of sensitive information and NPPI to be of utmost importance. As such personal information including NPPI will be used in a manner that is consistent with this Privacy Policy. For example, we will use the personal information to:

- identify you when you sign-in to the secure portal;
- enable us to provide you with the services for which you've contracted;
- send you information we think you may find useful or which you have requested from us;
- administer your account with us;
- analyze the use of our website to improve our content;
- aggregate your information with that of other clients in the course of processing trades, corporate actions, proxy voting or other services;
- use for other purposes that we may disclose to you when we request your information.

We also may obtain information about you from third party sources to verify your identity so we can properly process your requests and prevent fraud.

If you object to our collection or storage of any user Information mentioned above (and any additional information we may choose to gather) you should not use the website or secure portal.

## **RETENTION**

In situations in which we are required to process your data to meet legal requirements, we will hold information for as long as necessary for these purposes or as required by these laws and will ensure your data is reviewed over time to ensure it is not held when it is no longer necessary. Where we process personal data for marketing purposes or with your consent, we process the



data until you ask us to stop, and for a short period after this (to allow us to implement your request).

## EMAIL

As a client of Anchor Capital Advisors, LLC, communication preferences are determined upon entering into a contract. Should you agree to electronic communication email contact with and from Anchor please note:

- we will send you email relating to your accounts;
- we may send you service-related announcements when it is necessary or proper to do so;
- we maintain records of all email communication; and
- we may send you emails from time to time advising you of news about The Company.

It is your responsibility to ensure that you maintain a current email address with Anchor Capital Advisors, LLC, and notify us if there are any changes.

## THIRD PARTY SERVICES

Anchor Capital Advisors, LLC limits the disclosure of your personal information and strives to keep it private and confidential. Please be advised that our services may require the disclosure of your information to process transactions in your account.

We do not sell, share, license, lease or otherwise disclose your personal information to any unaffiliated third party for any reason, except as follows:

- we may disclose your personal information when such disclosure is required or appropriate pursuant to laws, court orders or securities regulations, including responding to court orders and subpoenas, cooperating with government agencies, other regulatory bodies and law enforcement officials, performing background checks, resolving disputes or performing risk-management functions.
- we may share your personal information either singly or aggregated with other clients, with companies that provide services to us, including outside contractors or agents who help us manage our information activities, carry out certain internal functions such as account processing, client services or other data collection relevant to our business. Use of any personal information shared in connection therewith is strictly limited to the performance of the task we request and for no other purpose.
- in the event of a corporate sale, merger, reorganization, dissolution or similar event, personal information may be part of the transferred assets and you will be notified via email and/or a prominent notice on our website of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

**We do not currently disclose any personal information for direct marketing purposes.** If at any time this were to change, such changes will be timely communicated to you, and you shall be afforded an opportunity to opt out. If you have any further



questions concerning our information sharing practices, you may raise them by contacting your relationship manager.

## **SAFEGUARDING USER INFORMATION**

The Security of your personal information is of the utmost importance to us, and we have policies and procedures in place to safeguard this information. These safeguards are in line with industry standards and practices and include:

- encryption and authentication tools to maintain the confidentiality of information including Transport Layer Security technology (TLS) encryption certificates provided by Comodo CA Limited (SHA-256 With RSA Encryption);
- limits on, to the greatest extent possible, who or what can access your information, including utilization of a “least-privilege principle” such that employees have access only to the information and systems needed to perform their functions and only for the duration of such need;
- redundant systems to monitor the entire Anchor Capital Advisors, LLC’ server infrastructure in real-time with reporting and notification to the appropriate staff for any remediation; and

Despite these efforts, please note that Anchor Capital Advisors, LLC cannot ensure or guarantee the security of your personal information, nor do we make any representation or warranty regarding the security of your account. If we learn of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. Depending on your state of residence, you may have a legal right to receive notice of a security breach in writing.

## **ACCURATE INFORMATION**

You are solely responsible for helping us to maintain the accuracy and completeness of your personal and other information. We urge you to review your information regularly to ensure that it is correct and complete. If you believe that any of your information is incorrect, please contact your relationship manager.

## **CALIFORNIA CONSUMER RIGHTS**

**The CCPA grants consumers various rights in regard to their personal information, including:**

- The **right to know** what personal information a business has collected about the consumer ( including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer.
- The **right to delete** personal information that the business has collected from the consumer, subject to certain exceptions.



- The **right to correct** inaccurate personal information that a business maintains about a consumer.
- **The right to opt-out of the sale or sharing** of their personal information by the business. Anchor does not currently sell or share personal information.
- The **right to limit the use or disclosure** of sensitive personal information in some circumstances.

These rights may be limited in some situations – for example, if fulfilling your request would reveal personal data about another person, in situations in which those rights would infringe upon the rights of a third party (including our rights), or if you ask us to delete information that we are required by law to keep or that we have compelling business interests in keeping.

### **Non-Discrimination:**

California residents also have the right not to receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA. We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this privacy notice.

## **EXERCISING YOUR CALIFORNIA CONSUMER RIGHTS**

To exercise any of your California consumer rights please Email contact [info@anchorcapital.com](mailto:info@anchorcapital.com), or call 1.888.303.7708. Please include a description of what right you want to exercise and the information to which your request relates. Please note that you may only make a disclosure request twice within a 12-month period.

### **VERIFYING YOUR IDENTITY**

If you are a consumer or an employee, please provide identifying information. For all other individuals, we will ask that you provide more information to assist in identifying you. We will attempt to confirm your identity.

### **AUTHORIZED AGENT**

California residents may authorize an agent to make an access or deletion request on your behalf. A California resident's authorized agent may make a request on behalf of the California resident, however, as part of our verification process, we may request that you provide, as applicable, identifying information of both the person making the request and granting the authority and confirmation of authorization to make the request.

### **COOKIES**

Cookies are small pieces of information which are issued to your computer when you visit a website and which store and sometimes track information about your usage. Anchor's website uses cookies to help recognize you as a repeat visitor, to try to make your browsing experience



meaningful. When you enter our site, our web server sends a cookie to your computer which allows us to recognize your computer but not specifically who is using it. By associating the identification numbers in the cookies with other customer information when you log-on, then we know that the cookie information relates to you. Some of the cookies used are served by us, and some are served by third parties. The use of cookies by any third parties, including our service providers, is not covered by this privacy policy. We do not have access or control over these cookies.

Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent this or to notify you each time a cookie is sent. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different browsers. We recommend cookies be turned on in order to receive the best experience.

## **LINKS TO OTHER WEBSITES**

We are not responsible for the practices employed by websites linked to or from our website nor the information or content contained therein (collectively “third-party sites”). Please remember that when you use a link to go from our site to a third-party site, our privacy policy is no longer in effect. Your browsing and interaction on any third-party site, including those that have a link on our site, is subject to that site’s rules and policies. Please review those rules and policies before proceeding.

## **INTERNATIONAL USERS**

The information on our website may be accessed by users located outside the United States. If you choose to use the site from the European Union or other regions of the world with laws governing data collection and use that may differ from U.S. law, then please note that you are transferring your personal information outside of those regions to the United States and by providing your personal information you consent to that transfer.

## **UPDATES AND CHANGES TO PRIVACY POLICY**

We reserve the right at any time to add to, change, update, or modify this privacy policy. Any such change, update or modification will be effective immediately upon posting to our website. We encourage you to periodically review this page for the latest information on our privacy practices. Clients of Anchor Capital will also receive a copy of the privacy policy annually in accordance with their communication preferences.

## **CONTACT ANCHOR CAPITAL ADVISORS, LLC**

If you have questions or comments about this privacy policy, or your choices with regards to our collection and use of your personal information, please contact your relationship manager, email us at [info@anchorcapital.com](mailto:info@anchorcapital.com), or call 1.888.303.7708.

